

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:)	Chapter 7 Case
Chastity A. Ellis,)	Case No. 17-38300
)	
Debtor.)	Hon. Jacqueline P. Cox

NOTICE OF MOTION

TO: See Attached List

PLEASE TAKE NOTICE that on **Tuesday, April 6, 2021 at 1:00 PM**, I will appear before the Honorable Jacqueline P. Cox, or any judge sitting in Judge Cox's place, and present the United States Trustee's **Motion for Order Reopening Chapter 7 Case Pursuant to 11 U.S.C. § 350(B) and Rule 5010 of the Federal Rules of Bankruptcy Procedure and for Authorization to Appoint a Chapter 7 Trustee**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, (1) use this link: <https://www.zoomgov.com/>. (2) Enter the meeting ID 1612732896. (3) Enter the passcode 778135.

To appear by telephone, (1) call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. (2) Enter the meeting ID 1612732896. (3) Enter passcode 778135.

When prompted identify yourself by stating your full name.

To reach Judge Cox's web page go to www.ilnb.uscourts.gov and click on the tab for Judges.

If you object to this motion and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may call the matter regardless.

/s/ Adam G. Brief
Adam G. Brief, Assistant U.S. Trustee
OFFICE OF THE U.S. TRUSTEE
219 S. Dearborn Street
Chicago, IL 60604
adam.brief@usdoj.gov
(202) 503-7104

CERTIFICATE OF SERVICE

I, Adam G. Brief, Assistant U.S. Trustee, certify that I served copies of the **Notice of Motion and Motion for Order Reopening Chapter 7 Case Pursuant to 11 U.S.C. § 350(B) and Rule 5010 of the Federal Rules of Bankruptcy Procedure and for Authorization to Appoint a Chapter 7 Trustee** on each entity shown on the attached list at the address shown and by the method indicated on the list on March 26, 2021 at 5:00 PM.

/s/ Adam G. Brief

SERVICE LIST

Registrants Served Through the Court's Electronic Notice For Registrants:

Robert B Katz rkatz.trustee@gmail.com
Michael L Sherman shermlaw1@aol.com
David M Siegel davidsiegelbk@gmail.com

Parties Served via First Class Mail:

CHASTITY A. ELLIS
4066 APPLEBY LN.
RICHTON PARK, IL 60471

CHASTITY A. ELLIS
12716 S RACINE AVE
CALUMET PARK, IL 60827-6402

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:
CHASTITY A ELLIS

CASE NO: 17-38300

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 7

On 3/26/2021, I did cause a copy of the following documents, described below,
Reopen Case
Proposed Order

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 3/26/2021

/s/ Adam G. Brief
Adam G Brief 016542000
Assistant United States Trustee
OFFICE OF THE UNITED STATES TRUSTEE
219 S DEARBORN STREET
CHICAGO, IL 60604
202 503 7104

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:
CHASTITY A ELLIS

CASE NO: 17-38300

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 7

On 3/26/2021, a copy of the following documents, described below,

Reopen Case

Proposed Order

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 3/26/2021



Jay S. Jump
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Adam G Brief
OFFICE OF THE UNITED STATES TRUSTEE
219 S DEARBORN STREET
CHICAGO, IL 60604

PARTIES DESIGNATED AS "FIRST CLASS" WERE NOT SERVED WITH FIRST CLASS MAIL.
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-RECEIPT" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

FIRST CLASS
CHASTITY A. ELLIS
4066 APPLEBY LN.
RICHTON PARK IL 60471

FIRST CLASS
CHASTITY A. ELLIS
12716 S RACINE AV
CALUMET PARK IL 60827-6402

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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In Re:)	Chapter 7 Case
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Chastity A. Ellis,)	Case No. 17-38300
)	
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)	
Debtor.)	Hon. Jacqueline P. Cox

**MOTION FOR ORDER REOPENING CHAPTER 7 CASE
PURSUANT TO 11 U.S.C. § 350(b) AND RULE 5010 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE AND FOR
AUTHORIZATION TO APPOINT A CHAPTER 7 TRUSTEE**

Patrick S. Layng, the United States Trustee for the Northern District of Illinois (“U.S. Trustee”), by and through the Assistant U.S. Trustee, Adam G. Brief, hereby requests entry of an order reopening this case pursuant to Section 350(b) of the Bankruptcy Code and Bankruptcy Rule 5010 and for authorization to appoint a chapter 7 trustee. In support of his motion, the U.S. Trustee respectfully states as follows:

JURISDICTION

1. The Court has jurisdiction to hear and determine this proceeding under 28 U.S.C. § 157(b)(2) and IOP 15(a) and Local Rule 40.3.1 of the United States District Court for the Northern District of Illinois.

2. Movant is the U.S. Trustee for the Northern District of Illinois and is charged with supervising the administration of bankruptcy cases under 28 U.S.C. § 586(a). The U.S. Trustee has standing to bring this Motion under 11 U.S.C. § 307.

BACKGROUND

3. Chastity A. Ellis commenced this case by filing a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on December 29, 2017.

4. Robert B. Katz was appointed and served as the chapter 7 trustee (“Chapter 7 Trustee”). On February 2, 2018, the Chapter 7 Trustee filed a No Asset Report. [Doc. 8] Subsequently, the Court entered an order discharging the Chapter 7 Trustee and closing this bankruptcy case.

5. More recently, the U.S. Trustee received notification that Ms. Ellis has a lawsuit concerning a prepetition claim.

6. Upon information and belief, the U.S. Trustee believes that the proceeds from this lawsuit may be property of the estate pursuant to 11 U.S.C. § 541(a).

RELIEF REQUESTED

7. The U.S. Trustee requests that the Court reopen this bankruptcy case and authorize the U.S. Trustee to appoint a chapter 7 trustee.

8. Section 350 of the Bankruptcy Code provides that:

(a) After an estate is fully administered and the court has discharged the trustee, the court shall close the case.

(b) A case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause.

Rule 5010 of the Federal Rules of Bankruptcy Procedure implements Section 350(b).

9. Based on the foregoing, the U.S. Trustee requests that the Court reopen this bankruptcy case and authorize the U.S. Trustee to appoint a chapter 7 trustee to further investigate and determine whether assets are available for creditors and for any other action the chapter 7 trustee deems necessary.

WHEREFORE, the U.S. Trustee respectfully asks the Court to enter an order: (1) reopening this case; (2) authorizing the U.S. Trustee to appoint a chapter 7 trustee to represent the estate; and (3) for such other and further relief as this Court deems appropriate.

RESPECTFULLY SUBMITTED,
PATRICK S. LAYNG
UNITED STATES TRUSTEE

Dated: March 26, 2021

/s/ Adam G. Brief
Adam G. Brief, Assistant U.S. Trustee
OFFICE OF THE U.S. TRUSTEE
219 S. Dearborn Street
Chicago, IL 60604
adam.brief@usdoj.gov
(202) 503-7104